

Message

From: Jackson, Hylton [hylton.jackson@dnr.iowa.gov]
Sent: 1/28/2020 3:46:29 PM
To: Mehta, Sandeep [mehta.sandeep@epa.gov]
CC: amie.davidson@dnr.iowa.gov; Fisher, Susan [Fisher.Susan@epa.gov]; Pessetto, Jared [Pessetto.Jared@epa.gov]
Subject: Re: FW: Vogel Paints & Wax Superfund site swrau
Attachments: ATT00001.txt

I've looked at the request and the Iowa DNR is requesting a couple of clarifications before it can recommend supporting or rejecting the change in the SWRAU achievement date.

- As I understand it, the SWRAU can be issued any time when the applicable requirements are met at the site. This includes cleanup status and Institutional Controls? EPA and IDNR are not currently in agreement on these issues. (Iowa Registry listing and GW point of compliance)
- How was the original SWRAU achievement date of 2035 selected? What rationale is used for the proposed achievement date of 2028?
- The site is a state lead site and the IDNR is not convinced that choosing an arbitrary target for future compliance with a SWRAU achievement date would have any benefit to this site. Maybe we should postpone this action until we see some results from the pilot study and discuss some of the unresolved issues.

As such, the IDNR does not support the change at this time.

On Thu, Jan 23, 2020 at 12:48 PM Mehta, Sandeep <mehta.sandeep@epa.gov> wrote:

Hylton:

The review of Superfund Task Force recommendations at EPA HQ resulted in “**The Sitewide Ready for Anticipated Use**”, or SWRAU, measure with other Superfund measures as part of EPA’s 2018-2022 Strategic Plan.

Vogel Paints site has had Remedial Action Report completed for soils operable unit in 2000.

The ESD for groundwater operable unit was issued in 2000 and the groundwater monitoring has been ongoing at the site. Since then, IDNR has also issued Consent Orders to work with the Responsible Party on modifications to the Remedial Action for the groundwater.

The EPA HQ has requested input from Region 7 on planning the SWRAU date, and therefore, the Region 7 EPA is requesting IDNR’s input as lead agency at this site.

I am providing the link to SWRAU guidance (<https://www.epa.gov/superfund-redevelopment-initiative/performance-measures-superfund-sites#SWRAU>) for IDNR's benefit and use.

Planning for SWRAU at Vogel site would be in line with the Responsible Party's interests in moving the site forward.

The EPA Region 7 believes that the Vogel site could achieve SWRAU by 2028, and would like to get IDNR's thoughts on planning 9/30/2028 as the SWRAU achievement date. Please let us know IDNR's thoughts, and if possible, IDNR concurrence & support.

The EPA Region 7 is requesting IDNR's input on or before COB 1/30/2020.

Very Respectfully,

Sandeep Mehta, P.E.

Email: Mehta.sandeep@epa.gov

Work: 913-271-5433



From: Fisher, Susan <Fisher.Susan@epa.gov>
Sent: Monday, January 13, 2020 11:35 AM
To: Mehta, Sandeep <mehta.sandeep@epa.gov>
Subject: swrau

Sandeep

Vogel paint has a CC, when can we get SWRAU? SEMS shows 2035, I think we can get it sooner.

Susan Fisher

Section Chief for the Federal Facilities and Post-Construction Section

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